

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN – SOUTHEASTERN DIVISION

PORCHA WOODRUFF,
Plaintiff,

Hon. Judith E. Levy
Case No.: 5:23-cv-11886

- VS -

CITY OF DETROIT and LASHAUNTIA OLIVER,
Defendants.

LAW OFFICES OF IVAN L. LAND, P.C.,
Ivan L. Land Sr. (P65879)
Attorney for Plaintiff
25900 Greenfield, Rd., Ste. 210
Oak Park, MI 48237
(248) 968-4545
Ill4law@aol.com

CITY OF DETROIT LAW DEPARTMENT
Gregory B. Paddison (P75963)
Attorney for Defendants
Coleman A. Young Municipal Center
2 Woodward Avenue, Suite 500
Detroit, MI 48226
(313) 237-0435
paddisong@detroitmi.gov

DEFENDANTS' SECOND SUPPLEMENTAL WITNESS LIST

NOW COMES Defendants, CITY OF DETROIT and LASHAUNTIA OLIVER, by and through their attorney, Gregory B. Paddison, and lists the following individual(s) and entities for Defendants' Second Supplemental Witness List:

SECOND SUPPLEMENTAL WITNESS LIST

1. Defendants hereby incorporate any witnesses filed on prior witness lists by any Defendant.
2. Defendants hereby incorporate any witness list filed on prior witness lists by Plaintiff.
3. Defendants hereby reserves the right to amend witness lists up to and including Trial.

4. Defendants reserve the right to supplement this list after receipt of Plaintiff's list of expert witnesses, or further investigation in the course of this case.

EXPERT WITNESSES

1. Dr. Robin Hanks, PhD – Psychology & NeuroPhysiology
2. Dr. Jeffrey Kezlarian, MD - Psychiatry

Upon information and belief, Dr. Hanks and/or Dr. Kezlarian will testify to the Psychological, Physiological, and Psychiatric impact of the incident alleged in Plaintiff's Complaint, including Plaintiff's relevant patient history and prognosis.

The facts and data to be considered by Dr. Hanks and/or Dr. Kezlarian in forming said testimony, include all Affidavits, Reports, Documents, and Materials produced by either party through discovery, or attached as an Exhibit to any pleading in this action, or as obtained through individual examinations of Plaintiff.

Dr. Hanks and/or Dr. Kezlarian, may use as an Exhibit to summarize or support said testimony or opinions; any Affidavit, Report, Document, or Material produced by either party through discovery, or attached as an Exhibit to any pleading in this action.

Please see Dr. Hanks and Dr. Kezlarian's *curriculum vitae*, for their qualifications and a list of all publications authored during the preceding ten (10) years.

A list of all other cases in which, during the previous four (4) years, Dr. Hanks and/or Dr. Kezlarian testified as an expert at trial or by deposition, is currently being prepared and will be provided to Plaintiff upon completion thereof.

Dr. Hanks and/or Dr. Kezlarian's compensation is presently being negotiated. When an agreement as to compensation is reached, a statement of the same will be provided to Plaintiff.

Respectfully submitted,
CITY OF DETROIT LAW DEPARTMENT

Dated: July 18, 2024

/s/ Gregory B. Paddison
Gregory B. Paddison (P75963)
Attorney for Defendants